Camp Navajo Stakeholder Advisory Board (SAG) Meeting

Wednesday, April 9, 2003 11:00 a.m. to 2:00 p.m. Camp Navajo Administrative Building Bellemont, AZ

Minutes

Members in attendance:

LTC Tim Cowan, Camp Navajo Randy Wilkinson, NGB Michele James, Grand Canyon Trust Tom Scott, City of Flagstaff Lee Luedecker, AGFD CPT William Fay, ADEMA Shaula Hedwall, USFWS

Members absent:

LTC Martin Herrera, Camp Navajo Alan Anderson, Coconino National Forest Ron Doba. City of Flagstaff Duane Miller, community member Tom Britt, community member

ADEQ Staff in attendance:

Stacy Duffy, Project Manager Alex Zavala, Community Involvement Coordinator

Others in attendance:

Linda Pollock, Attorney General's Office Denise Baker, USFWS Cullen Hollister, Camp Navajo Marty Rozelle, The Rozelle Group Daniel Criswell, ADEMA Tom Parker, ADEMA LTC Peter Tosi, Camp Navajo

The following acronyms may be used throughout this document:

ADEMA Arizona Department of Emergency and Military Affairs

ADEQ Arizona Department of Environmental Quality

AGFD Arizona Game and Fish Department
AZARNG Arizona Army National Guard
HLA Harding Lawson Associates
NGB National Guard Bureau

ORNL Oak Ridge National Laboratory
OB/OD Open Burning/Open Detonation
SAG Stakeholder Advisory Group
USFWS U.S. Fish & Wildlife Service
UXO Unexploded ordnance

The following matters were discussed, considered, and decided at the meeting:

1. Welcome and Introductions

Alex Zavala, Community Involvement Coordinator, welcomed everyone to the Camp Navajo SAG meeting at 11:05 a.m. Each attendee introduced himself/herself. The following administrative issues were discussed:

• Mr. Randy Wilkinson had questions regarding the corrections to the November 6, 2002 draft minutes and the January 8, 2003 draft minutes. Ms. Zavala will provide the

- corrected November 6, 2002 draft minutes and the draft January 8, 2003 minutes to the SAG before the next scheduled meeting. The SAG requested that draft minutes be provided to the SAG as soon as possible after the meeting, preferably within one week.
- Mr. Wilkinson informed the SAG that two SAG members would be replaced. Denise Baker is replacing Kirk King and LTC Peter Tosi is replacing LTC Martin Herrera.
- Mr. Wilkinson wondered about the possibility of holding a public open house. LTC Tosi
 responded by saying that it would depend on the terrorist threat status due to the strict
 guidelines that must be followed in those situations. The SAG asked whether the open
 house could be held at another location. Mr. Wilkinson said that the open house could be
 held at an alternate location, the only issue is with bringing visitors to the site.
- Ms. Stacy Duffy, ADEQ, informed the SAG that the verbiage that the AZARNG requested be removed from the Camp Navajo factsheet was in fact correct as it was originally written. The AZARNG requested that the term "chemical warfare agents" be replaced with the term "mustard gas." ADEQ consented and the term was changed before the factsheet was distributed to the public. However, after examining site files Ms. Duffy realized that there were other chemical warfare agents stored on the site, including mustard gas, therefore the term "chemical warfare agents" would have been more
- Mr. Lee Luedecker will call Mr. Alan Anderson and ask whether he would still like to be involved with the SAG.

2. Document Review and Discussion

Mr. Randy Wilkinson, NGB

- Operational History Report
 - * NGB received a draft Operational History report. The contract ended at a point where it could be renewed. However, due to the fact that the work product was deficient (did not include any new information), NGB decided not to renew the contract. NGB believes they are better off taking a different next step.
 - * The draft report was shared with ADEQ.
 - * Currently discussing the next step with Brown & Caldwell and the project team.
- Community Relations Plan (CRP)
 - * The Community Relations Plan has been finalized.
 - * Copies will be mailed to interviewees that helped with the process.
 - * The CRP will be made available to anyone who requests one.
 - * The CRP provided background information on the program and integrates the OB/OD with the IRP Program (which had not been done before). The plan includes an updated section on the community and community relations type of activities that either need to or can be done as the project progresses. This includes open houses, mailings, etc.
 - * Mr. Wilkinson added that in order to improve communication between the SAG and members of the public, as well as to cut down on copying costs, all of these documents are available on the web page.
- Draft-Final Report, Airborne Geophysical Survey for Unexploded Ordnance
 - NGB received the report in February 2003.
 - * This program was funded by the Army BRAC (Base Realignment and Closure)
 Office. Their monetary commitment did not include support activities required to
 complete such a project. Therefore, it is missing a follow-up ground survey
 needed to correlate the geophysical anomalies. This work will be conducted this
 summer.
 - * The report is factual and straightforward. However, it is standard processing technique to review geophysical data in order to identify targets. 13,000 targets

- were identified after the data was reviewed.
- * NGB needs to take a closer look at the identified targets in order to determine if they are real UXO or scrap or just geology.
- * NGB spoke with Oak Ridge National Laboratory and the following was agreed upon:
 - \rightarrow NGB will accept this as an interim report
 - → ORNL will work with NGB in identifying ground truthing this summer.
 - → ORNL will take the results, reprocess, and calibrate data in order to determine what the targets actually are
- * Any comments submitted regarding this document will be included into the revision of the next document. Therefore, those who wish to submit comments have some time to do so.
- * Mr. Wilkinson added that the TIF images available on the website allow you to zoom into the targets that were identified.
- * The demolition pits area is in the center of the OB/OD area. The colored areas represent the areas that were examined. Blue and pink represent the geophysical and magnetic anomalies minus the regional magnetic field. Blue is regional small variations, pink is highly magnetic. You can see a pattern, all that can be estimated from this pattern is that they are cindered roadways that do not show up on aerial photos.
- * The pink coloring found away from the hot areas in the OB/OD pits could be individual anomalies.
- * The survey also included Volunteer Canyon and the area perimeter, the Pyrotech Range area, and the EOD site on the northern edge. (Refer to maps on website).
- * The SAG wondered whether targets extend off base like it appears to do on the Pyrotechnical Survey, and whether that area was covered.
- * Mr. Wilkinson responded that they did not go outside of the boundary. As he recalls from the site's history, munitions were fired to the northwest, and he is not sure why those targets are there. CH2M Hill has not been able to go out to survey the area because it is closed due to the sub-munitions in the area. They will be out in the area within a few days to check things out.
- * The SAG asked if any targets were found in the Volunteer Canyon area. Mr. Wilkinson responded that a few were found along the mouth of the Phosphorus area, some along the northern boundary, and some by the bridge.
- Mr. Wilkinson informed the SAG that if anyone had any comments they could submit them to ADEQ (Lou Minkler). He added that the documents will have various turnaround times depending on the time-sensitivity of the document.
- * Ms. Michele James noted that the cover had the wrong date listed. The 2002 needs to be changed to 2003.
- * The SAG requested that a timeline be developed with comment due dates for each document and that this timeline be added to the website.
- * Mr. Wilkinson will get with ADEQ to set comment due dates for the documents. He will then post the dates on the website as well as e-mail them to the SAG.
- * Ms. Stacy Duffy informed the SAG that ADEQ is in the process of contracting a UXO expert to help with document review. The contractor should be in place within the next month. ADEQ will inform the SAG as to who was awarded the contract as soon as that information is determined.
- * Mr. Wilkinson added that due to the timing of the SAG meetings, the SAG may not be able to discuss all of the documents. He added that if anyone has questions regarding any of the documents they can contact him or Ms. Duffy for clarification. Also, both Mr. Wilkinson and Ms. Duffy have hard copies of all of the documents in case anyone has trouble opening them from the web page.

- Background and Remediation Metal Standards Technical Memorandum
 - * Mr. Wilkinson informed the SAG that under the CERCLA Program, metals need to be cleaned to background levels (there are some metals that occur naturally and may be considered hazardous to human health or the environment).
 - * Because of the volcanic materials in the area, there are high levels of metals content.
 - * If high levels of metals are found and there is no source for that metal then a sitespecific assessment can be conducted for background levels. These levels can be used as the cleanup levels.
 - * This document addressed these issues. It looks at all the regional and nearby studies with metals and soils data, as well as clean areas to see what those levels are in comparison to Arizona soil level standings.
 - * Close to 15,000 soil samples have been taken throughout Camp Navajo by the Onsite Metals Program. Based on statistical data from that program, NGB determined that except for arsenic, beryllium, and thallium, most metals are below Arizona's cleanup standards. Based on the statistics they kept some background levels where anything at that range or lower are probably just naturally occurring and not due to some previous activity; anything above that range is suspect for a potential spill.
 - * Mr. Wilkinson added that in statistics you usually select a level at the 95% confidence limit so there may be 5% that may be above the regulatory levels (these will be captured and assessed).
 - * NGB proposed a new remediation standard for the three metals (arsenic, beryllium, thallium). NGB is asking ADEQ to assess and discuss the proposed values. If ADEQ agrees, then these will be the remediation levels for these metals.
 - * Ms. Duffy informed the SAG that ADEQ is in the process of reviewing the proposed remediation levels. She added that there was a concern regarding beryllium and whether or not this metal was used in any casings. ADEQ found it strange that this metal was found at such high concentrations.
 - * One of the SAG members mentioned that beryllium is a metal used in nonsparking tools and that it is not likely that it would be found in large chunks.
 - * Mr. Wilkinson explained that the 15,000 soil samples mentioned earlier did not include previous HLA data of the OB/OD area because NGB knows that there is a source there and it is not representative of naturally occurring situations.
 - * The SAG questioned whether the beryllium background concentrations are higher than Arizona levels and whether EPA's new information regarding risk factors for carcinogens was used to determine the proposed standards. Mr. Wilkinson explained that the beryllium concentrations are higher than Arizona levels and that EPA's new information was in fact used as well as other information (he will have to go back and review the documents to determine exactly why).
 - Mr. Wilkinson asked Ms. Duffy whether the deadline set to submit comments for this document was April 16,2003. Ms. Duffy said yes but asked Mr. Wilkinson for an extension in order to allow the SAG to submit any comments they may have. The deadline to submit comments for this document was extended. The new comment due date for the SAG (submit to ADEQ) is April 23, 2003. ADEQ will provide all comments (SAG's and ADEQ's) to NGB by April 25, 2003. Ms. Duffy will check with ADEQ management whether the SAG's comments will be incorporated as part of ADEQ's or if they will be listed separately with an explanation.
 - * Mr. Wilkinson added that this document was developed as a buyout program for

the rest of the installation and that a lot of those sites are nearing closure (this will impact those sites as well).

- Final Draft Summary Letter Report of the Open Detonation Pits Sampling Event
 - * Ms. Zavala provided the SAG with a copy of the cover letter to this report.
 - * Mr. Wilkinson explained that the map figures in this report show the sampling locations overlaid on an aerial photo of the site.
 - Data was collected from around 17 of the pits; a few soil samples were taken in between and away from the pits. Sampling data included 20 sediment samples, 15 surface soil samples, 12 subsurface soil samples, 10 water samples (from water in the pit).
 - * The SAG questioned how long the water had been out there before NGB conducted its sampling. Mr. Wilkinson replied that the water had been there about a week or two. He added that if the water is a little acidic maybe it pulls stuff into the solution quick and early but if it is stagnant it may be a different condition
 - * Analyses were run for metals, white phosphorus, explosives, nitrate, nitrite, sulfide, sulfur, perchlorate, perchlorolate, and picric acid.
 - * The results in the report assess soil and water data.
 - * Tissue samples data are not included in this report. Jones and Stokes are no longer conducting this work; the new contractor is Harris Environmental and will be conducting all future work. NGB has seen the lab data for the tissue sampling and knows that no explosive residues were identified in the tissues, however, some metals were detected.
 - * Metals in the OB/OD area tissues were higher than the control site outside the OB/OD. Metals were present in the vole tissues. Inside OB/OD area seven or nine mice were collected and in the control area there was split with voles and mice.
 - * Ms. Linda Pollock asked whether the protocol for the tissue tests was reviewed by USFWS. Ms. Shaula Hedwall informed Ms. Pollock that USFWS did not review the protocol. Ms. Pollock then asked Mr. Wilkinson why. It was concluded that timing was the issue. The sampling came together very quickly and NGB also had issues come up with the contractor.
 - * Ms. Denise Baker added that USFWS should be more involved earlier in the process so that they are able to comment and advise as to what the best steps to take would be. Mr. Wilkinson agreed and thanked Ms. Baker and the SAG for their comments.
 - * Ms. Pollock then asked when the tissue data would be available and whether a presentation would be made to the SAG. Mr. Wilkinson explained that the data will not be available for three more weeks and that at this point a presentation had not been planned. NGB will decide what the next step will be once the data is received.
 - * Ms. Pollock asked whether the tissue sampling report would be available on the web and if so, whether it would be the full report or a summary. Mr. Wilkinson explained that the full report would be available and added that all of the reports that have been available have been the full reports. In response to a question about the information repository, Mr. Wilkinson added that it takes a while for the final documents to get to the library (where the repository is) but that all of the draft documents can be reviewed at Camp Navajo and/or at ADEQ.
 - * Mr. Wilkinson explained that most of the soils came up non-detect for explosives and that a few of the detections were above the non-residential soil remediation levels. This information follows along with HLA's previous findings.
 - * The water data was compared to aquatic and wildlife standards for ephemeral

- waters. Low levels of explosives and metals were found in the water but nothing above standards.
- * Arsenic was detected in many of the soil samples at levels higher than nonresidential cleanup levels. However, they are all below the proposed background level (this is where the proposed background levels come into play).
- * Ms. Duffy asked Mr. Wilkinson to explain how TNT-chunking occurs. Mr. Wilkinson explained that as part of the conceptual model for a site like this you will get detonated explosives when detonating units, bombs get either thrown out intact or chunks scattered here and there (they don't completely cover the area). Therefore, depending where you sample you may get a high concentration or no detections at all. NGB was expecting this for the entire area and the kick-out range needs to be assessed as part of the Archive Search Report. What was there, where, and how far did it go, etc. are the types of questions that the Archive Search Report should answer.
- * Ms. Michele James questioned the holding time for perchlorate (found on page 7 of the report). Mr. Wilkinson was not sure why the Kelso lab exceeded the holding time for perchlorate but will check the case narrative to determine why.
- * Mr. Tom Scott noted a mistake on page 7: 2,700m/kg should be changed to 2,700 mg/kg and 770 m/kg to 770 mg/kg.
- * Mr. Wilkinson added that the original purpose of this sampling event was considered to be an emergency sampling event and that the next step is the feasibility study for the OD pits. NGB wanted to make sure there was sufficient data in order to be able to take this next step. They wanted to characterize the site properly before moving forward. (Because the data is detailed in two separate documents, NGB would like the documents to be considered separately).
- * Ms. Hedwall asked whether the background metals report had to be finalized before comments could be made on the tissue sampling report (in order to determine whether any more data is necessary). Ms. Duffy will copy the SAG when she submits ADEQ's comments on the background metals to NGB (by Monday, April 14, at the latest). Mr. Wilkinson reminded the SAG that this report only includes data and that this data will not be interpreted until the Feasibility Study (FS). The time frame for the FS depends on whether or not more sampling is needed. If no more sampling is needed then the FS can probably begin in the fall.

Waiver Request for Army

- The waiver request for the army was revised several times and it is now back for one more revision. NGB hopes to have it signed by next week.
- * This report was submitted because the OB/OD area was completely closed when sub-munitions were found last year. In the request NGB delineates the area of concern and states that within this area is where it expects to find the submunitions. Once this report goes through the Army, then NGB will go through the buffer area. CH2MHill is waiting to get in there in order to be able to write the UXO work plan. Within the next few weeks, NGB expects to start working on roadways and perimeter areas in order to determine what work will be necessary to get in and cleanup those areas.
- * NGB expects that the Army will be more conservative. Therefore, they are being aggressive in their request but more conservative in the area. NGB has been informed that there are many requests ahead of this one, therefore, they are rewriting the cover letter to ensure it addresses the urgency. NGB does not have an estimated time frame as to when they will hear back from the Army. Work cannot be conducted in the area without this waiver.

- * Mr. Cullen Hollister had concerns regarding the upcoming fire season and security in the area. He asks that he be kept informed so that he can plan accordingly. Mr. Wilkinson explained that security and fire concerns are very high on their list of priorities for clearance activities. However, while they await the waiver, they would like to go out to the buffer area and start clearing some roads. Mr. Hollister reminded Mr. Wilkinson that until the waiver is in place, no one can go into the area; he added that no one is allowed in the area even in case of a fire. Mr. Wilkinson added that the NGB is trying to set protocols on how they will deal with issues on a site-wide basis (this includes safety, field sampling, analyzing data, etc.)
- * The area of concern is a 3000-foot circle with the center located in the OB/OD pits (approximately 650 acres). For operational purposes NGB is staying wide; not going west of Volunteer Canyon (the UXO technicians might have to go into Volunteer Canyon for vitally necessary work).

3. Site Update and Other Work Plans-

Randy Wilkinson, NGB

- The second year owl survey will be conducted according to protocol. NGB met with USFWS to plan this. Plan to be out around perimeter area within one week.
- UXO work plan, Groundwater and Surface Water Monitoring plan should be out in July 2003. (This is an installation wide plan. The first round (maybe two) will take place in the fall, then quarterly for a few years).
- Although there are a few wells within the OB/OD area, NGB may possibly install one new deep well within the next year.
- The biological and cultural survey report is also due soon.
- CPT Fay added that MAJ Meyer from MMR (an airmag survey expert) may be able to come out and serve as a technical expert for the site.
- Mr. Wilkinson informed the SAG that NGB is working on setting up a database with GIS so that all of the new information can be documented. This will also allow a piece of UXO to be traced from discovery to storage to detonation to cleanup, etc.
- ADEQ and NGB have been holding monthly project management meetings to stay current on progress. These meetings also allow a time to discuss technical issues, scheduling, etc. The SAG may be able to form subcommittees in the future if SAG members are interested in focusing on certain topics.
- NGB hopes to have all documents out by the end of May/early June.

4. Call to the public

There were no public comments.

7. Future meeting plans

The next meeting was set for June 4, 2003.